

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
JUAN BELLIARD, on behalf of himself  
and all others similarly-situated,

Plaintiffs,

-against-

KORYEO INTERNATIONAL CORP.,  
and STEVE HONG, in his professional and  
individual capacities,

Defendants.  
-----X

Civil Action No.: (PK)  
14-CV-3495 (ENV)(~~VVP~~)

**COURT AUTHORIZED NOTICE OF LAWSUIT**

If you worked at KORYEO INTERNATIONAL CORP. between June 4, 2011 and the present as a warehouse worker, please read this Notice.

*Important: You are NOT being sued. This Notice is NOT a solicitation from a lawyer.  
The Court authorized this Notice.*

- Plaintiff Juan Belliard is a former employee of Koryeo International Corp., where he worked as a warehouse worker. Mr. Belliard brought this lawsuit against Koryeo International Corp. and Steve Hong on behalf of himself and all other current and former similarly situated warehouse workers, employed since June 4, 2011. Mr. Belliard claims that Koryeo International Corp. did not pay him for all hours worked, including all minimum wages and overtime due.  
at some time
- Defendants deny any wrongdoing and/or liability and deny that any employee was underpaid for his or her work.
- This lawsuit is currently in the early pretrial stage. The Court has made no finding on the merits of the claims raised by the Plaintiffs or Defendants' various defenses.
- The Court has authorized the parties to send out this Notice. The Court has not decided who is right or who is wrong. However, your legal rights may be affected, and you have a choice to make now.

## YOUR LEGAL RIGHTS AND OPTIONS IN THIS LAWSUIT

ASK TO BE INCLUDED	If you choose to be included in this collective action, you must complete the consent form at the end of this Notice. You may then share in any proceeds from a settlement or judgment if those bringing the claims are successful, but you give up any rights to separately sue the Defendants about the same legal claims in this lawsuit.
DO NOTHING	By doing nothing, you will not be included in this lawsuit relating to claims under the Fair Labor Standards Act.

### 1. Why did I get this notice?

at some time between  
You are getting this notice because Koryeo International Corp. records show that you may have worked as a warehouse worker at Koryeo International Corp. ~~from~~ June 4, 2011 ~~to~~ the present and Plaintiff alleges that you are similarly situated to him as a warehouse worker. and

### 2. What is a collective action and who is involved?

In a collective action lawsuit, one or more persons can bring a lawsuit on behalf of others who have similar claims. The individuals who brought this lawsuit are called the Plaintiffs. The corporate entities and individuals that they have sued are called the Defendants. One Court resolves the issues for everyone who decides to join the case.

### 3. What is this collective action lawsuit about?

Plaintiffs allege that Koryeo International Corp.'s compensation practices violated federal and state law. Plaintiffs claim that they and other warehouse workers are entitled to unpaid wages, overtime, liquidated damages, attorneys' fees, and costs.

Defendants deny any wrongdoing and/or liability and maintain that all of their employees are paid in accordance with federal and state law.

### 4. How do I join this collective action lawsuit?

To participate in this lawsuit, you need to fill out the enclosed form called "Consent to Join" and mail it in the enclosed, postage-paid envelope to Plaintiffs' lawyers. Should the enclosed envelope be lost or misplaced, the Consent to Join form must be sent to:

Borrelli & Associates, P.L.L.C.  
Re: Koryeo International Corp. Case  
1010 Northern Boulevard, Suite 328  
Great Neck, New York 11021  
(516) 248-5550

You can also fax the Consent to Join form to (516) 248-6027 or scan and email it to [sve@employmentlawyernewyork.com](mailto:sve@employmentlawyernewyork.com)



The signed Consent to Join form must be postmarked, faxed, or e-mailed by [60 days from mailing of notice]. If your signed Consent to Join form is not postmarked, faxed, or e-mailed by [60 days from mailing of notice], you may not be allowed to participate in the federal law portion of this lawsuit.

5. What happens if I join the collective action lawsuit?

You will be bound by any ruling, settlement, or judgment, whether favorable or unfavorable. If there is a favorable resolution, either by settlement or judgment, and you qualify under the law, you may be entitled to some portion of the recovery. By joining this lawsuit, you designate Plaintiff Juan Belliard, and to the fullest extent possible, you designate Plaintiff or his counsel, to make decisions on your behalf concerning the case, the method and manner of conducting the case, and all other matters pertaining to this Lawsuit. Decisions made and agreements entered into by Plaintiffs relating to the Lawsuit will be binding on you if you join the Lawsuit.

While this lawsuit is pending, you may be asked to provide documents or information relating to your employment at Koryeo International Corp., which may include responding to written questions. For this reason, if you join the lawsuit, you should preserve all documents relating to your employment at Koryeo International Corp. currently in your possession. Plaintiffs' attorneys will assist you.

6. What happens if I do nothing at all?

You will not be included in this lawsuit and you will not be affected by any settlement or judgment rendered in this case, whether favorable or unfavorable. The limitations period on your claims continues to run.

7. Can I participate in this collective action lawsuit regardless of my immigration status?

Yes. You have a right to participate in this Lawsuit regardless of your immigration status.

8. If I join, will there be any impact on my employment?

Federal law prohibits Defendants from discharging or in any other matter retaliating against you because you join this case.

9. Do I have a lawyer in this case?

Plaintiffs are represented by Borrelli & Associates, P.L.L.C. If you choose to join this Lawsuit, Borrelli & Associates, P.L.L.C. will represent you on a contingency fee basis, meaning you will not owe any attorneys' fees unless Plaintiffs are successful and win the case or obtain a settlement.

10. This Notice has been authorized by the Court

This notice and its contents have been authorized by Magistrate Judge ~~District Court Judge Eric Vitaliano~~ Peggy Kuo of the U.S. District Court, Eastern District of New York. The Court has not yet ruled on whether Plaintiffs' claims or Defendants' defenses have any merit.

PLEASE DO NOT WRITE OR CALL THE COURT ABOUT THIS NOTICE

Although the Court has approved the sending of this Notice, the Court expresses no opinion on the merits of the Lawsuit.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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JUAN BELLIARD, on behalf of himself  
and all others similarly-situated,

Plaintiffs,

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KORYEO INTERNATIONAL CORP.,  
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IF YOU RECEIVED THIS FORM AND WANT TO JOIN THIS LAWSUIT, PLEASE COMPLETE  
THESE TWO STEPS:

1. COMPLETE AND SIGN THIS CONSENT TO JOIN LAWSUIT FORM; AND
2. USE THE ENCLOSED ENVELOPE TO RETURN THIS FORM TO THE ADDRESS  
BELOW NOT LATER THAN [60 days from mailing of notice].

Borrelli & Associates, P.L.L.C.  
Re: Koryeo International Corp. Case  
1010 Northern Boulevard, Suite 328  
Great Neck, NY 11021

YOU CAN ALSO FAX THE CONSENT TO JOIN FORM TO (516) 248-6027,  
OR SCAN AND EMAIL IT TO: sve@employmentlawyernewyork.com

I consent to join the collective action and authorize Plaintiffs and Borrelli & Associates, P.L.L.C. to act  
on my behalf in all matters relating to this action, including any settlement of my claims.

\_\_\_\_\_  
SIGNATURE

\_\_\_\_\_  
PRINT NAME

\_\_\_\_\_  
Address

\_\_\_\_\_  
City, State, Zip Code

\_\_\_\_\_  
Telephone Number

\_\_\_\_\_  
Email Address

\_\_\_\_\_  
Start Date

\_\_\_\_\_  
End Date